

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,

*Plaintiff,*

V.

EASTMAN KODAK COMPANY,  
ALTEK CORPORATION, and  
CHINON INDUSTRIES, INC.,

*Defendants.*

C.A. No. 04-1373 (KAJ)

**NOTICE OF DEPOSITION OF DEFENDANT EASTMAN KODAK COMPANY  
RE: IMAGE QUALITY AND USER INTERFACE SPECIFICATIONS**

TO: All Parties and their Attorneys of Record:

**PLEASE TAKE NOTICE:** Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ampex will take the deposition of Defendant Eastman Kodak Company (“Kodak”), commencing on February 27, 2006, at 9:00 a.m., at the Alliance Building, 183 East Main Street, Suite 1500, Rochester, NY 14604, or at such other time and place agreed upon by the counsel to the parties.

Kodak shall designate one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Schedule A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or reasonably available to Kodak.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed.

You are invited to attend.

MORRIS NICHOLS ARSHT & TUNNELL LLP

/s/ Julia Heaney

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February 2, 2006

## **SCHEDULE A**

### **INSTRUCTIONS AND DEFINITIONS**

Ampex incorporates by reference the instructions and definitions set forth in its First Set of Document Requests to Defendant Eastman Kodak Company (1-70) and its Fourth Set of Document Requests to Defendant Eastman Kodak Company (92-136).

### **SUBJECT MATTER CATEGORIES**

1. The image quality testing of the Kodak Devices, including without limitation the results of all image quality tests performed on each of the Kodak Devices.
2. The use of “image experts” (*see, e.g.*, Sasson 4/27/2005 Tr. at 39:7-16) during the development or production of any of the Kodak Devices, including but not limited to the identity any such “image experts” and the evaluation performed by any such “image experts.”
3. User interface requests from the design group in Rochester to KDPC (*see* Domen 1/20/2006 Tr. at 18-20 (“Q: From whom do you receive user interface requests? A: Mainly from design group in Rochester”)), including without limitation the source of such requests, how decisions are made with respect to such requests, and any data or other information on which decisions to make such requests are based.
4. The development of user interaction specifications (*see, e.g.*, Domen Dep. Ex. 360, EKCNYI005093324-818) for each of the Kodak Devices, including without limitation any data or other information on which requirements in such specifications are based.
5. Kodak’s specification of the display time for Multi-up mode (*see, e.g.*, Domen Dep. Ex. 360 at 273 (EKCNYI005093596) (“Full display of multi-up screen showing all nine still pictures . . . should take no longer than 4.5 seconds.”)) including, but not limited to, the specified display time for that Device in Multi-up mode, why the speed with which the multi-up screen is displayed is important (*see, e.g.*, Domen 1/20/2006 Tr. at 49:11-15), and the reason(s) Kodak specified that display time including, but not limited to, any data, surveys, or market studies Kodak used in determining a specified display time.

**CERTIFICATE OF SERVICE**

I, Julia Heaney, hereby certify that on February 2, 2006, I caused to be electronically filed the foregoing *Notice of Deposition of Defendant Eastman Kodak Company* with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff, Esquire  
David E. Brand, Esquire  
Prickett, Jones & Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

**BY HAND**

Paul M. Lukoff, Esquire  
Prickett, Jones, Elliott,  
1310 King Street  
Wilmington, DE 19899

**BY FEDERAL EXPRESS**

Michael J. Summersgill, Esquire  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
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/s/ Julia Heaney  
Julia Heaney (#3052)